

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

LIZA IRENE NAVARRO COLON

CASE NO. 13-05529-MCF

Debtor

CHAPTER 13

FIRST BANK PUERTO RICO

Movant

INDEX

Vs.

LIZA IRENE NAVARRO COLON  
ALEJANDRO OLIVERAS RIVERA

AS DEBTOR / TRUSTEE

**DEBTOR'S RESPONSE TO MOTION FOR RELIEF OF THE AUTOMATIC STAY  
FILED BY FIRST BANK PUERTO RICO, DOCKET #41,  
AND MOTION FOR EXTENSION OF TIME**

TO THE HONORABLE COURT:

**NOW COMES, LIZA IRENE NAVARRO COLON**, debtor through the undersigned attorney, and very respectfully states and prays as follows:

1. On November 28, 2014, First Bank Puerto Rico ("Firstbank") filed a *Motion for Relief of Stay*, docket #41, basically alleging that debtor is in arrears in her direct post-petition payments with said creditor, in the sum of \$3,201.25, including late charges accrued and costs.

2. The debtor hereby respectfully submits the present motion informing the Court that she is in the process of obtaining the funds to cure the arrears owed on the direct post-petition arrears to Firstbank.

3. The debtor proposes that she will cure the arrears owed Firstbank within thirty (30) days from December 22, 2014, the date of the scheduled preliminary hearing, in

Page -2-  
Debtors' Response to §362 Motion  
Case no. 13-05529-MCF13

the above captioned index. This extension of time to expire on January 21, 2014.

**WHEREFORE** debtor respectfully requests from this Honorable Court that upon curing the post-petition arrears, deny the motion for relief from stay filed by Firstbank.

**I CERTIFY** that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of the same to: the Chapter 13 Trustee Alejandro Oliveras Rivera, Esq.; Maria M. Benabe Rivera, Attorney for Firstbank; I also certify that a copy of this motion has been sent via US Postal Service to the debtor/respondent, Liza Irene Navarro Colon, to her address of record: HC 04 Box 44787 Caguas, PR 00725.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 15<sup>th</sup> day of December, 2014.

/s/Roberto Figueroa Carrasquillo  
ROBERTO FIGUEROA CARRASQUILLO  
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